

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

GROUPON, INC.,)
)
Plaintiff,)
)
v.) Case No. 1:21-cv-06082
)
SUNG SHIN,)
)
Defendant.)

**PLAINTIFF'S MOTION FOR LEAVE TO FILE OVERSIZED BRIEF IN SUPPORT
OF PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER**

Plaintiff Groupon, Inc. (“Groupon” or “Plaintiff”), by and through its undersigned counsel, and for its Motion for Leave to File Oversized Brief in Support of its Emergency Motion for Temporary Restraining Order, states as follows:

1. Groupon filed its Complaint in this Court on November 12, 2021, alleging, *inter alia*, Defendant’s breach of his contractual non-competition obligations to Plaintiff and Defendant’s misappropriation of Plaintiff’s trade secrets.
2. In connection with its Complaint, Groupon also filed an Emergency Motion for Temporary Restraining Order and a Memorandum in Support of its Motion (the “Memorandum”).
3. Groupon’s Memorandum includes detailed factual recitation and analysis concerning the protective covenants, trade secrets and confidential information at issue.
4. Briefs in this Court are limited to fifteen (15) pages without prior leave of the Court pursuant to Local Rule 7.1. But, in order to adequately set forth the basis for its entitlement to immediate injunctive relief, Groupon respectfully requests leave to file its Memorandum up to and including thirty-seven (37) pages in length.

5. This Motion is made in good faith and not for purposes of delay or any other improper purpose.

6. Due to the emergent nature of this Motion, and the fact that this case is not yet pending, counsel for Groupon has not been able to confer with counsel for Defendant to ascertain whether this Motion is unopposed.

WHEREFORE, Groupon respectfully requests that the Court grant its Emergency Motion for Leave to File its Memorandum in Support of its Emergency Motion for Temporary Restraining Order in excess of Fifteen Pages.

Dated: November 12, 2021

Respectfully submitted,

/s/ Kevin M. Cloutier

Kevin M. Cloutier, Esq. (6273805)

Shawn D. Fabian, Esq. (6310637)

SHEPPARD MULLIN RICHTER & HAMPTON LLP

70 W. Madison St., Suite 4800

Chicago, Illinois 60602

kcloutier@sheppardmullin.com

sfabian@sheppardmullin.com

Tel: (312) 499-6300

Fax: (312) 499-6301

Attorneys for Plaintiff Groupon, Inc.